## **REMARKS**

Claims 1-11 are pending in this application. By this Amendment, claim 1 is amended, and claims 10 and 11 are added. No new matter is added. Reconsideration and withdrawal of the rejections are respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiners Kau and Lamb in the May 8 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

## I. The Claims Define Patentable Subject Matter

The Office Action rejects claims 1-9 under 35 U.S.C. §103(a) over U.S. Patent No. 7,103,221 to Ohta et al. (Ohta) in view of U.S. Patent No. 4,677,571 to Riseman et al. (Riseman) and U.S. Patent Publication No. 2002/0097419 to Chang et al. (Chang). This rejection is respectfully traversed.

Independent claim 1 recites, *inter alia*, "the storing includes compressing the grayscale image data and the associated segmentation information." Support for the amendment can be found in the specification at, for example, page 7, line 23 - page 8, line 6.

As discussed during the May 8 interview, the passage of Ohta relied on by the Office Action for disclosing the recited feature merely discloses the storage of image data. Ohta fails to disclose that the storing includes compressing the grayscale image data and the associated segmentation information. Chang and Riseman fail to cure the deficiencies of Ohta. Accordingly, the applied references, alone or in any combination, fail to teach or suggest the subject matter recited in independent claim 1.

Independent claim 7 recites, *inter alia*, "in response to a determination that the print controller is capable of effectively processing the device-independent N-plane MRC image data, submitting the N-plane MRC image data to the print controller."

As discussed during the May 8 interview, the passage of Ohta relied on by the Office Action for disclosing the recited feature merely discloses the selection of the output to either the binarizing circuit or the error-diffusion binarizing circuit and sending the output to the printer. Ohta fails to teach or disclose that in response to a determination that the print controller is capable of effectively processing the device-independent N-plane MRC image data, submitting the N-plane MRC image data to the print controller. Chang and Riseman fail to cure the deficiencies of Ohta. Accordingly, the applied references, alone or in any combination, fail to teach or suggest the subject matter recited in independent claim 7.

For at least these reasons, independent claims 1 and 7 and the claims dependent therefrom are patentable over the applied references. Thus, withdrawal of the rejection of the claims is respectfully requested.

## II. Claims 10 and 11

Claims 10 and 11 are added. Support for claims 10 and 11 can be found in the specification at, for example, page 7, line 23 - page 8, line 6. Claims 10 and 11 are patentable at least in view of the patentability of claim 1, from which they depend, as well as for the additional features they recite.

## III. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the pending claims are earnestly solicited.

Xerox Docket No. D/A2351 Application No. 10/607,761

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff

Registration No. 27,075

Obert H. Chu

Registration No. 52,744

JAO:OHC/mdw

Date: May 9, 2007

OLIFF & BERRIDGE, PLC P.O. Box 19928 Alexandria, Virginia 22320 Telephone: (703) 836-6400 DEPOSIT ACCOUNT USE
AUTHORIZATION
Please grant any extension
necessary for entry;
Charge any fee due to our
Deposit Account No. 24-0037